

# LITCHFIELD CAVO<sub>LLP</sub>

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June 24, 2019

Via Email: [SRP@Pietragallo.com](mailto:SRP@Pietragallo.com)

Shelly R. Pagac, Esquire  
One Oxford Centre  
301 Grant Street, 38th Floor  
Pittsburgh, PA 15219

**RE: Michael Olijnyk and The Mattress Factory  
Our File No. 2780-29711)**

Dear Ms. Pagac:

Thank you for speaking with me last week relative to the current status of discussions between our clients. It is my understanding that your client has requested that all further communication be handled by counsel. During our discussion, you advised that your client demands a written proposal outlining some of the terms of his relationship with the Mattress Factory moving forward before he would be willing to sit down and discuss with us how the parties may achieve a resolution. Accordingly, I have been authorized to make the following proposal to you.

Effective July 1, 2019 or on a later date pending the parties' discussion, Mr. Olijnyk's employment (salary and benefits) with the Mattress Factory will terminate. Mr. Olijnyk would immediately be appointed Director Emeritus of the Mattress Factory, effective the same date, with the following roles:

- a. Role with leadership search - Mr. Olijnyk will serve on the committee to select future Mattress Factory Leadership Representatives;
- b. Role with Turrell Campaign - Mr. Olijnyk will serve on the capital campaign committee related to the James Turrell project.

Neither of the aforementioned roles would create an employment relationship between Mr. Olijnyk and the Mattress Factory. In serving as Director Emeritus, Mr. Olijnyk would not be an employee of the

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June 20, 2019

Page 2

Mattress Factory, have supervision of any employees of the Mattress Factory or have any input on employment/human resource issues.

My client would also require a Confidential General Release of All Claims to be executed by Mr. Olijnyk.

Once you have had the opportunity to review with your client, please contact me so that we can set up a time that the parties can meet and discuss this proposal and your client's response in more detail. I look forward to hearing from you.

If we do not hear from you by June 30, 2019, we will assume that your client has no further interest in an amicable resolution.

Thank you

Very truly yours.

*Trisha A. Gill*

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